

# EXHIBIT 8

1  
2 UNITED STATES DISTRICT COURT  
3 FOR THE SOUTHERN DISTRICT OF NEW YORK

4 Index No. 1:18-cv-09936-LGS

5 CATHERINE MCKOY, MILLARD WILLIAMS,  
6 MARKUS FRAZIER, and LYNN CHADWICK  
7 individually and on behalf of all  
others similarly situated,

8 Plaintiffs,

9 -vs-

10 THE TRUMP CORPORATION, DONALD J. TRUMP,  
11 in his personal capacity,  
12 DONALD TRUMP, JR.,  
ERIC TRUMP, and IVANKA TRUMP,

13 Defendants.  
14 \_\_\_\_\_/

15  
16 VIDEOTAPED DEPOSITION OF DONALD J. TRUMP

17 Tuesday, October 11, 2022  
18 9:37 a.m. - 3:16 p.m.

19 The Mar-a-Lago Club  
20 1100 South Ocean Boulevard  
Palm Beach, Florida 33480

21  
22  
23 Stenographically Reported By  
24 Pamela J. Pelino, RPR, FPR, CLR  
Notary Public, State of Florida  
TSG REPORTING  
25 Job #:218087

- - -

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1 D.J. TRUMP

2 corporate sponsors; correct?

3 A. Yes.

4 Q. Let's go back to your daughter's book,

5 because she explains it very well.

6 If we could look at your daughter's book,

7 DJT 6, and turn to page 239.

8 A. (Witness complies.)

9 Q. And if you look at the bottom of that

10 page, your daughter writes --

11 A. Go ahead.

12 Q. Your daughter writes: "One of the

13 hallmarks of my father's television show has been

14 the brand-backed tasks or projects the contestants

15 are assigned. These invariably involve a corporate

16 sponsor, which naturally looks to integrate its

17 product or service into our story line so that

18 there's a clear carryover benefit to its business.

19 Think of it as a transparent form of product

20 placement. But you can be sure that NBC and the

21 show's producers, including my father, naturally are

22 being compensated handsomely for the 'free air

23 time.'"

24 That's -- your daughter described how the

25 corporate sponsorships worked on the show; correct?

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1 D.J. TRUMP

2 A. Yes.

3 Q. And as a 50/50 partner with Mr. Burnett,

4 you received half of those fees?

5 A. Approximately, yes.

6 Q. All in all, The Apprentice, just based on

7 the fees you received from The Apprentice and The

8 Celebrity Apprentice, ended up being extremely

9 lucrative for you; correct?

10 A. Yes.

11 Q. The New York Times estimated that you

12 received up to a total of \$47.8 million for the

13 show.

14 Does that sound right to you?

15 A. No, it's not. For one season?

16 Q. No, the whole --

17 A. No, it's much more.

18 Q. Much more?

19 A. Yeah, much more.

20 Q. Can you approximate now?

21 A. I don't know. I mean, I don't know what

22 the final number was. But I would say the show

23 made -- I think the show made hundreds of millions

24 of dollars.

25 Q. Okay. And you would have gotten roughly

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1 D.J. TRUMP

2 A. A little bit. If you could read it

3 again, please.

4 Q. Sure. And you can follow with me if you

5 want. It's the bottom of page 239. Your daughter

6 writes -- you have it? It's at the very bottom of

7 the page.

8 A. Yeah.

9 Q. "One of the hallmarks of my father's

10 television show has been the brand-backed tasks or

11 projects the contestants are assigned. These

12 invariably involve a corporate sponsor which

13 naturally looks to integrate its product or service

14 into our story line so that there's a clear

15 carryover benefit to its business. Think of it as a

16 transparent form of product placement, but you can

17 be sure that NBC and the show's producers, including

18 my father, naturally, are being compensated

19 handsomely for the 'free air time.'"

20 A. Yeah.

21 Q. That's a correct description of how the

22 sponsorships worked?

23 A. Sure.

24 Q. And the corporate sponsors paid a fee --

25 paid fees to be on the show?

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1 D.J. TRUMP

2 half of that?

3 A. Yes.

4 Q. Now, in your book How to Get Rich --

5 MS. KAPLAN: We'll mark this as DJT 9.

6 (DJT Exhibit 9 was marked for

7 identification.)

8 BY MS. KAPLAN:

9 Q. On page 269, you write: "I'm told that

10 The Apprentice is the highest rated show featuring a

11 non-acting businessman in the history of television.

12 When TV viewers think of business in America, a lot

13 of them are going to be thinking about the Trump

14 Organization."

15 A. Uh-huh.

16 Q. I want to focus on that last sentence.

17 You agree, sitting here today, that as a

18 result of The Apprentice, when TV viewers think of

19 business in America, a lot of them thought of the

20 Trump Organization?

21 A. Could be, yeah.

22 Q. Okay. There was a woman who worked for

23 you by the name of Meredith McIver?

24 A. Yes.

25 Q. Do you recall what her role was at the

Page 58

1 D.J. TRUMP

2 not what I was asking. I was asking --

3 A. Okay, but you're telling me something

4 that's incorrect.

5 Q. Okay.

6 A. They think they know me.

7 Q. Good.

8 And one of the reasons why people bought

9 your books or would come to hear you speak publicly

10 is because they want to hear how it is that he has

11 done so well, how you have made so much money;

12 correct?

13 MR. ROBERT: Objection to form.

14 You can answer, sir.

15 THE WITNESS: Well, I would think so.

16 BY MS. KAPLAN:

17 Q. And in your book Think Big --

18 MS. KAPLAN: Do you have -- do you have

19 that? Let's mark this as DJT 14.

20 (DJT Exhibit 14 was marked for

21 identification.)

22 BY MS. KAPLAN:

23 Q. At the top of page 162, you wrote --

24 well, let me just clean up the record.

25 So DJT 14 i it a book entitled Think Big

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1 D.J. TRUMP

2 MR. ROBERT: If we could take five

3 minutes. And the time, Ms. Reporter, just to

4 be clear.

5 THE VIDEOGRAPHER: Off the record. The

6 time is 10:33.

7 (A brief recess was taken.)

8 MS. KAPLAN: On the record.

9 THE VIDEOGRAPHER: On the record. The

10 time is 10:43.

11 BY MS. KAPLAN:

12 Q. I'm going to shift gears a little bit,

13 Mr. Trump, and we're going to go to a different

14 topic.

15 Are you familiar with the company known

16 as ACN?

17 A. Yes.

18 Q. Do you know what ACN stands for?

19 A. No. I did at one time. I don't remember

20 now.

21 Q. Isn't it true that ACN is a multilevel

22 marketing company?

23 A. I believe so, yes.

24 Q. And do you understand that to be the same

25 thing as a network marketing company?

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1 D.J. TRUMP

2 written by Donald Trump.

3 And on page 162, sir, you wrote: "Some

4 of my best people have been with me for decades. I

5 reward people highly for their loyalty to me and to

6 the entire Trump Organization. We are all working

7 together to become more successful."

8 Does that sound like something you would

9 have written?

10 A. Yep.

11 Q. And it's true, is it not, that you had a

12 lot of employees at the Trump Org who worked with

13 you for a long time?

14 A. Yes.

15 Q. And many of these people were loyal,

16 hardworking, trustworthy employees; correct?

17 A. Sure.

18 Q. And those people include, but are not

19 necessarily limited to, Rhona Graff?

20 A. Yes.

21 Q. Hope Hicks?

22 A. Yeah.

23 MS. KAPLAN: It may be -- I need to use

24 the restroom. If it would be a good time to

25 take a short break.

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1 D.J. TRUMP

2 A. No, I don't.

3 Q. What's the difference?

4 A. I don't know. I don't know.

5 Q. What is a multilevel marketing company?

6 A. It's a company that has various

7 platforms, various things that they sell, and they

8 sell them in different manner and form.

9 Q. And can you explain how a multilevel

10 marketing company differs from a direct selling

11 company?

12 A. No, I can't.

13 Q. What's an IBO?

14 A. I don't know.

15 Q. I take it from your last answer that you

16 never became an IBO in ACN?

17 A. What is an IBO?

18 Q. Let me represent to that you IBO stands

19 for independent business operator.

20 A. Yeah. I wouldn't have known that, no.

21 Q. And it's fair to say that you were never

22 an ACN IBO?

23 A. No.

24 Q. And is it fair to say that to the best of

25 your knowledge, no one in your family was a ACN IBO?

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1 D.J. TRUMP  
2 A. I believe that to be true.  
3 Q. Sitting here today, do you know how a  
4 person became an IBO?  
5 A. No.  
6 Q. Sitting here today, do you know how much  
7 it costs to become an IBO?  
8 A. No, I don't.  
9 Q. Sitting here today, do you know how an  
10 IBO made money?  
11 A. No, I don't.  
12 Q. Sitting here today, do you know how an  
13 IBO's commissions were calculated by ACN?  
14 A. No, I don't.  
15 Q. Sitting here today, have you every heard  
16 the phrase "customer acquisition bonus" as used by  
17 ACN?  
18 A. No.  
19 Q. I take it, given that, you wouldn't know  
20 how IBOs earned customer acquisition bonuses?  
21 A. No, I wouldn't. Had nothing to do with  
22 the company.  
23 Q. Have you ever heard of the ACN phrase "A  
24 qualified team trainer"?  
25 A. No.

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1 D.J. TRUMP  
2 earn commissions, either, on downline sales?  
3 A. No, I don't.  
4 Q. Sitting here today, do you -- withdrawn.  
5 Do you know -- sitting here today, do you  
6 recall ever knowing how many ACN IBOs made a profit  
7 in their first year?  
8 A. I don't know. But I did speak to --  
9 during many speeches, I would speak to people that  
10 were involved with ACN. I'm not talking management;  
11 I'm talking about people that were involved. And  
12 they were tremendously happy, very happy.  
13 I'd see large groups of people before I'd  
14 speak and sometimes after I'd speak, and they were  
15 tremendously happy. Some were in there for a long  
16 time. And I always remember that.  
17 But I would see them almost all the time  
18 in large groups -- you know, fairly large groups or  
19 smaller groups or even individually, just by being  
20 there, by waiting to speak, et cetera, et cetera,  
21 and I'd meet people that were involved with ACN and  
22 they loved the company. That's one of the things  
23 that were -- you know, I mean, it was a company that  
24 was liked very much by the people I got to meet.  
25 Q. So if I understand your testimony,

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1 D.J. TRUMP  
2 Q. So you wouldn't know how an IBO became a  
3 qualified team trainer?  
4 A. No.  
5 Q. Do you know anything -- I take it for the  
6 same thing you wouldn't know the different levels  
7 above a qualified team trainer?  
8 A. I wouldn't know that, no.  
9 Q. Okay. Sitting here today, do you know  
10 whether attaining certain levels within ACN required  
11 IBO -- an IBO to recruit new IBOs into ACN?  
12 A. No, I wouldn't know that.  
13 Q. Have you seen an ACN compensation plan?  
14 A. No.  
15 Q. I take it you would therefore have no  
16 understanding of how their compensation plan worked?  
17 A. No, I don't know that.  
18 Q. Have you ever heard, in connection with  
19 ACN, the phrase "a downline"?  
20 A. No.  
21 Q. I take it you've never heard the phrase  
22 "an upline"?  
23 A. No, I have not.  
24 Q. I take it for the same reasons you  
25 have -- sitting here today, you don't know how IBOs

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1 D.J. TRUMP  
2 Mr. Trump, when you would give speeches for ACN,  
3 sometimes before the speech or sometimes after the  
4 speech --  
5 A. Yeah. Randomly, yeah.  
6 Q. -- you would meet with groups of people  
7 who were there who were involved with ACN; correct?  
8 A. Yeah. As an example, they would come up  
9 and say could we have a picture. I'd say, what do  
10 you do? I don't know if you call the word  
11 "investor" or whatever you'd call it, but we're  
12 involved with ACN. I'd say, Good. How are you  
13 doing? Oh, we love the company, we love the  
14 company. They were very happy people.  
15 And they were there for a long time, too.  
16 It wasn't just like they just joined. They were  
17 there for a long time.  
18 Q. Okay. So some of those conversations  
19 would happen as a result of photo opportunities?  
20 They wanted to get your picture?  
21 A. Yeah, photo opportunities and just being  
22 there.  
23 Q. Okay. And --  
24 A. And it wasn't set up by ACN. I mean,  
25 you'd just have -- you know, if I'd speak in front

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12 DONALD TRUMP, JR.,  
ERIC TRUMP, and IVANKA TRUMP,

Defendants.

13 \_\_\_\_\_/  
14  
15  
16 VIDEOTAPED 30(b)(6) DEPOSITION OF TRUMP CORPORATION  
17 THROUGH ERIC TRUMP

18 Tuesday, October 18, 2022  
19 9:31 a.m. - 10:57 p.m.

20 Trump National Golf Club  
21 115 Eagle Tree Terrace  
Jupiter, Florida 33477

22 Stenographically Reported By  
23 Pamela J. Pelino, RPR, FPR, CLR  
24 Notary Public, State of Florida  
TSG REPORTING

25 Job #: 218629

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going to ask you the same two questions.

Number one, was that person a Trump Corporation employee; and, number two, insofar as they had some involvement in the ACN relationship, you know, from the documents or their testimony, was that -- was whatever they were doing there part of their job duties? Was it essentially -- you know, were they acting within the scope of their employment when they assisted with scheduling or revised drafts of things and that sort of things.

A. Sure.

Q. Do those questions basically make sense?

A. Absolutely.

Q. Okay. So first, Norma Foerderer, was she a Trump Corporation employee? Insofar as she had involvement with ACN, was that within the scope of that employment?

A. Yes, she was a Trump Organization employee, Trump Corporation employee. She was my father's right-hand person. She sadly passed away a number of years ago.

But, yes, she was, from my understanding, and -- you know, again, I have no firsthand knowledge, but I have read the transcripts. I read

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E. TRUMP

Trump Corp. employee and was there involvement with ACN within the scope of that employee, what about Rhona Graff?

A. Yes, Rhona was a Trump Corp. employee. And it certainly would have been within the scope. She handled scheduling for my father and other tasks and, you know, was somebody who was with him for a very long time.

Q. Amanda Miller?

A. Amanda Miller would have been Trump Corporation. Amanda Miller was marketing.

Q. Okay. So, again, insofar as she was reviewing drafts of talking points or magazine articles and commenting on things, that was all within the scope of employment?

A. Yes.

Q. What about Meredith McIver?

A. Trump Corporation. And certainly, as I said, just, again, something my father did in his personal capacity could have been a great benefit to the corporation.

Q. And what about Cathy Glosser?

A. Yes, Cathy Glosser was a Trump Corporation employee. And the answer would be yes.

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Anne Archer's transcript and, you know, she was very, very clear that Norma was really a person, you know, at the table and was heavily involved in due diligence and was heavily involved in many other things, and vetting, and -- yes.

So Norma -- that was her role, to answer your second question. And, yes, she was a Trump Corporation employee, to the best of my knowledge.

Q. Okay. So Trump Corp. employee and acting in the scope of employment insofar as she engaged with the ACN relationship?

A. Yes. And just let me make one thing clear again. It's -- anything my father did in his kind of personal capacity was ultimately, you know, benefited, you know, the Trump Corporation and probably vice versa.

And so, yes, you had that natural, you know, overlap, especially with somebody who, you know, sat at his right side every single day and was -- you know, had been part of his life for a very long time.

Q. Got it.

All right. And so sticking with that same sort of couple of questions, was the person a

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E. TRUMP

Q. Meaning insofar as she was engaged with ACN, it was within the scope of employment?

A. Yes.

Q. Lynne Patton?

A. I mean, from my understanding, Lynne was more tangentially involved. But, yes, she was certainly a Trump Corporation employee. And any limited interaction -- I didn't come across much, but any limited interaction she would have had with them, yes, would have -- could have --

Actually, I don't know with Lynne Patton, to tell you the truth. Lynne certainly would have been involved in due diligence or any of the early years of ACN. The relationship that I testified to that I had with one of the partners, which was totally philanthropic in nature, Lynne would have in some way, shape, or form been involved in that. Whether or not that had to do with, you know, corporate relationship, I -- that would probably be stretching it.

But certainly all the other people you mentioned would be absolutely, yes.

Q. Okay. Ms. Patton was a Trump Corp. employee, though; right? Her salary and healthcare,

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BY MR. QUINN:

Q. So let me just pause on George Ross. What was his role at the company?

A. George Ross was an attorney for the company.

Q. And do you know what his title was? Was he general counsel, assistant general counsel, deputy general counsel?

A. One of those, John. He was an attorney for the company. And, you know, he was a person my father put a lot of trust in.

Q. When's the last time you spoke to Mr. Ross?

A. I spoke to him a few days ago, actually.

Q. Got it.

A. And I -- and I did so, John, in preparation for this. I wanted to be able to talk to people that -- whose names I had heard come up. And I -- you know, I spoke to a number of people just in my due diligence process, you know, acting as representative for the Trump Corporation.

Q. So you're aware of your father's testimony, then, about Mr. Ross?

A. Generally, yes.

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A. Well, certainly that -- that certainly came from my father, and he's the person who would by far have the most knowledge of this. Obviously, this was a deal they -- he did on a that matter he did, and George worked directly for him. So --

And it would make a lot of sense. I mean, George was, you know, one of the lawyers who had been with him for a very, very long time, and he trusted George's, you know, decision-making ability and just his overall judgment and read on people. And it would make sense that George was certainly at the table at that time.

Q. Does the Trump Corporation have any documentary record of Mr. Ross ever conducting an investigation or diligence into ACN?

A. We don't. It's actually something I spent a -- an interesting amount of time looking through. And, you know, this is well over a decade ago. Many of the people on the list that, you know, you've just referenced are either deceased or long gone from the company.

And, frankly, it's in a time where you probably had less electronic documents. You're not going to keep things around for 15 years,

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Q. Did you read that transcript or that portion of the transcript?

A. Well, I -- I heard. I asked the specific question who do you remember being involved, and my father certainly seemed to remember he was involved in some capacity.

And obviously I've read the transcripts of many others, and Norma's name came up over and over, which -- just my understanding, obviously, of that relationship seems to make a whole lot of sense, because she was always on his right side and was very protective and, you know, really, you know, was his, in a certain way, almost chief of staff.

And so, yes, George Ross came up in that conversation. Norma came up in that conversation. And -- yes.

Q. We'll come back to Norma.

But for Mr. Ross, so it sounds like you spoke to your father about him. You said you'd read some other transcripts.

Do you recall any of the other transcripts referencing Mr. Ross having any involvement in ACN? Do you recall anyone testifying to that?

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referencing -- you know, in some cases -- I actually think in this case maybe more -- in a time where, you know, you just had a lot less digital records.

Q. Well, the Trump Corporation -- I mean, we've spoken to Mr. Burnett, so I'll sort of leave the technicalities to him.

But there is a pretty large documentary record about this relationship. So just to confirm, you're not aware of any documentary record that reflects Mr. Ross having any involvement; right?

A. I haven't seen any. I'm not saying that there couldn't be, but it was certainly the reflection of my father that, you know, he and several others were at the table.

Q. Okay. But no record of Mr. Ross ever requesting anything from ACN or receiving anything from ACN; right?

A. Well, just based on all the testimony I read, including Anne Archer, who, you know, was very, very direct about this, she said that -- you know, Norma was the one who initially requested everything and, frankly, was very thorough and kind of very critical. So I wouldn't be surprised if -- if Norma was, you know, the one who requested it.



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It seems like that makes a lot of sense, both in terms of what I saw electronically as well as what the testimony was of people who were actually there. Remember, I was not.

And Norma's office and George's office were fairly near each other, so I wouldn't be surprised if they were coordinating and working on that together.

But, John, that's purely speculation. But it seems to make sense based on all the documents that I've read and certainly the accounts of the people who were at the table at that time.

Q. Okay. So we'll come to some of Norma's files and some of the testimony about that. But there was nothing separate associated with Mr. Ross that you're aware of that reflects any request for records from ACN or any provision of records; right?

A. Correct. It looks like all of that came vis-a-vis Norma, who very much seemed to be playing kind of the gatekeeper role.

Q. Okay. And, I mean, I'll represent to you we've -- especially after your father's testimony, we've gone back and checked, and we don't have a single file anywhere in the production from the

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George worked on a lot of things for the company. You know, he certainly said could have, and, you know, just 15 years later, whatever it is, you know, from -- I believe the initial date was what? 2006? Just doesn't remember at this point. I mean, George literally retired -- my guess is well over a decade ago and probably hasn't thought about this matter or these people since.

Q. Okay. So just to make sure I understand. He was very polite, indicated that he may have had some involvement but that he didn't actually remember any specific involvement at this point in time in 2022; is that --

(Simultaneous speaking.)

THE WITNESS: Yeah. I mean, I mentioned dates to George that, you know, could have been -- it could have been 2005, and he kind of laughed. And then you're approaching 17 years. 2005, 2006, whenever this relationship started, you're approaching 17 years, and the guy's been in retirement for at least a decade of that, and he probably hadn't thought of those guys since.

He just didn't recall off the top of his

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Trump Organization or any other witness that reflects any involvement on Mr. Ross' part with ACN.

Are you aware of anything inconsistent with that representation?

A. No. I mean, I have heard specifically from my father that he believed that George Ross was involved to the best of his, you know, memory. And I know for certain, based on my review of records and my speaking to people and the testimony of many others, that Norma was certainly kind of leading that effort, running the due diligence. They seem to be the names that come up the most from the people who were actively involved.

And, again, I caveat this with, you know, I was not there. I was not in the room. Everything that I'm saying to you is what I've learned in preparation for this deposition.

Q. And as part of that process, you mentioned you spoke with Mr. Ross. What was the substance of that discussion?

A. It was very nice. George has been out of the company for, I'm guessing 10, 12, maybe 15 years at this point, a very long time. You know, he had limited recollection of ACN.

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head. He said it was totally possible and just didn't recall, you know, what the exact involvement was.

BY MR. QUINN:

Q. Okay. Well, let me just make sure. I mean, didn't actually specifically recall any involvement, just thought that it was possible and at this point memories fade; right? But that he doesn't actually remember any involvement at this point in time?

A. Certainly memories fade. He said it was hugely impossible. He was a person that was very trusted by my father. This is something that was likely, just based on who he was, to have crossed his desk sometime by my father and/or Norma, but just 17 years later didn't recall specific conversations, which I certainly understand.

Q. Let me shift gears and ask you to turn to tab 44.

(ET Exhibit 44 was marked for identification.)

BY MR. QUINN:

Q. We're going to tick through a whole series of agreements here, and I just want to make

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X  
CATHERINE MCKOY, MILLARD WILLIAMS,  
MARKUS FRAZIER, and LYNN CHADWICK  
individually and on behalf of all  
others similarly situated,                      Index No.  
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Plaintiffs                      (LGS)

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THE TRUMP CORPORATION, DONALD J. TRUMP,  
in his personal capacity, DONALD TRUMP  
JR., ERIC TRUMP, and IVANKA TRUMP,  
Defendants.

-----X

\*\* CONFIDENTIAL \*\*

DEPOSITION OF IVANKA TRUMP

August 4, 2022

Reported by:

MARY F. BOWMAN, RPR, CRR

JOB NO. 213327

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1 I. Trump - Confidential  
2 ask you first, have you ever seen this  
3 document before?  
4 A. I don't know. I'm just looking  
5 at it now.  
6 Q. Let me try to be -- explain it in  
7 nonlawyer terms.  
8 This is a document in which  
9 parties to a case can ask the other side to  
10 answer written questions.  
11 A. Okay.  
12 Q. And the other side has to answer  
13 those questions subject to their  
14 objections.  
15 A. Okay.  
16 Q. And this is the version of that  
17 in this case in which our clients, the  
18 plaintiffs, asked you and your dad and the  
19 other defendants to answer certain  
20 questions --  
21 A. Okay.  
22 Q. -- and certain answers were  
23 provided.  
24 If you turn to page 16, request  
25 number 18, in the middle, says, "Admit that

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1 I. Trump - Confidential  
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1 I. Trump - Confidential  
2 each of the following defendants appeared  
3 alongside ACN representatives in an episode  
4 of The Celebrity Apprentice that was aired  
5 on March 22, 2009," and then it lists your  
6 dad, your brother and yourself.  
7 A. Okay.  
8 Q. And if you look at the bottom  
9 there, it says, Subject to the objections,  
10 defendants admit, A, is that Donald Trump  
11 appeared on the show, and then if you turn  
12 the page, B is that your brother appeared  
13 on the show, and C is that you appeared on  
14 the show.  
15 A. Okay.  
16 Q. Let's watch another clip and see  
17 if it helps to refresh your recollection.  
18 A. Thank you.  
19 MR. ROBERT: Are you done with  
20 15?  
21 MS. KAPLAN: Yes.  
22 (Exhibit IT16, video clip from  
23 season 8, episode 4 of The Apprentice,  
24 marked for identification, as of this  
25 date.)

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16 Q. Do you know whether anyone at The  
17 Trump Org had done any due diligence on ACN  
18 at that point in time?

19 A. I don't know.

20 Q. Rhona Graff testified in this  
21 case that she is not aware of anyone at The  
22 Trump Organization negotiating for greater  
23 access to diligence information about ACN.

24 Do you have any reason to believe  
25 that that isn't true?

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MR. ROBERT: I am going to object to form.

You can answer.

A. I don't know either way.

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A. I don't think I have -- I don't

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have an understanding. I don't even remember the task.

Though seeing some of these clips is bringing back a lot of Apprentice memories.

Q. A lot of what, I'm sorry?

A. A lot of Apprentice memories more generally.

Q. Oh, Apprentice. I thought you said "Prince still," and I was like what?

A. No, no, a lot of Apprentice memories. Seeing Joan was nice.

Q. Let's take out the hard document.

I don't have another copy of this. I apologize.

I'm opening and I'm going to put on the table a copy -- not a copy -- a video phone known as the "ACN Iris 3000 video phone," which I'll represent to you was the video phone that was in circulation at the time the 2009 episode was being filmed.

MR. ROBERT: So we will mark it, and you will keep the original in your

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custody?

MS. KAPLAN: Correct.

And the record should reflect that it's in a -- I'm going to stand. I'm very high wasted.

It's in a black case, and it says, "ACN digital phone service."

MR. ROBERT: We will mark the case and the device as one exhibit?

MS. KAPLAN: If that's okay with you.

MR. ROBERT: That's fine.

Q. I'm going to pull out the phone, an electric cord, a what looks to me like a phone cord, black electric cord, gray phone cord, and what look like speaker wires that were all in the package.

I'll also represent that we purchased this on eBay, and if you guys want, we kept the information from when we purchased it.

(Exhibit IT17, video phone known as the "ACN Iris 3000 video phone," with case and accessories, marked for